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13 **IN THE UNITED STATES DISTRICT COURT**
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
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17 JOHN DOE, an individual

18 Plaintiff,

19 v.

20 CHEVRON CORPORATION, and
21 CHEVRON GLOBAL TECHNOLOGY
SERVICES CO.

22 Defendants.

23 Case No. 3:25-cv-04534

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28 **DECLARATION OF ERICA POSEY IN
SUPPORT OF (1) PLAINTIFF'S REPLY
ISO ADMINISTRATIVE MOTION TO
PROCEED UNDER A PSEUDONYM
AND (2) PLAINTIFF'S
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE REPLY**

Concurrently Filed/Lodged With:

1. Administrative Motion for Leave to File Reply in Support of Plaintiff's Motion to Proceed Under a Pseudonym
2. [PROPOSED] Reply ISO Administrative Motion to Proceed Under a Pseudonym
3. [PROPOSED] Order Granting Leave to File Reply Brief

1 DECLARATION OF ERICA POSEY

2 I, Erica Posey, declare under the penalty of perjury that the following is true and correct. I
3 am over the age of 18. The facts stated in this declaration are true of my own personal knowledge,
4 except as to any matters stated on information and belief, and as to those matters, I am informed and
5 believe them to be true. If called as a witness, I would and could competently testify to the matters
6 set forth below.

7 1. On Tuesday, May 27, 2025, Bryan Schwartz, counsel for Plaintiff, reached out to
8 Catherine Conway via email to inquire whether she would accept service of the complaint in the
9 above-named matter, as the attorney who has represented Defendants throughout prelitigation
10 proceedings on this matter. Ms. Conway responded and indicated that while she would likely be
11 able to accept service in the matter, she would need to check in with her clients first.

12 2. On Wednesday, May 28, 2025, Ms. Conway requested that we share some pages of
13 the initial complaint, so as to advise her clients of their contents prior to agreeing to accept service.

14 3. On Thursday, May 29, 2025, in the morning, I sent the caption pages for both the
15 complaint and administrative motion to proceed under a pseudonym to Ms. Conway via email so
16 that she could advise her clients of the contents prior to agreeing to accept service.

17 4. In the afternoon of Thursday, May 29, 2025, after filing the complaint and having
18 still not heard back from Ms. Conway with respect to her authority to accept service, our office
19 proceeded with filing the administrative motion to proceed under a pseudonym. We shared file-
20 stamped copies of the motion and complaint with Ms. Conway via email after filing, with the
21 understanding that we would not formally serve the documents until Ms. Conway confirmed her
22 authority to accept service of the pleading in this matter.

23 5. On Friday, May 30, 2025, Ms. Conway confirmed that she would accept service of
24 the pleading as of Monday, June 2, 2025.

25 6. On Monday, June 2, 2025, after our paralegal served the papers via email on Ms.
26 Conway, Mr. Schwartz reached out to Ms. Conway via email to inquire about Defendant's position
27 on the Administrative Motion to Proceed Under Pseudonym. At this time, Ms. Conway indicated
28 that Defendants intended to oppose the motion. That evening, Defendants filed their opposition.

1 7. I did not seek a stipulation from Defendant's counsel on the administrative motion to
2 proceed under a pseudonym because it was unclear whether Ms. Conway would have authority to
3 issue such stipulation or negotiate on behalf of her client with respect to the impending litigation at
4 the time of filing. We did seek to meet and confer with Defendants regarding the issue immediately
5 after they accepted service of the pleading in this matter, but were unable to update the Court as to
6 their position prior to the filing of their opposition.

7 8. On Wednesday, June 4, 2025, I emailed all counsel for Defendants who have entered
8 a notice of appearance thus far in the case to meet and confer regarding our Motion for Leave to File
9 a Reply in Support of Plaintiff's Motion to Proceed under Pseudonym. Defendants' counsel
10 indicated that they intended to oppose the request.

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12 DATED: June 4, 2025

13 /s/ Erica Posey
14 Erica Posey (SBN 356109)
15 BRYAN SCHWARTZ LAW, P.C.
16 *Attorney for Plaintiff*